

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Thiesing Veneer
300 Park Dr
Mooresville, Indiana 46158

ATTENTION:

Robert Mathers
President
RMathers@thiesingveneer.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency (EPA) is requiring Thiesing Veneer (Thiesing or you) to submit certain information about the facility at 300 Park Dr. Mooresville, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within the schedules provided in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the EPA Administrator to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Thiesing manufactures wood veneer products at the Mooresville, Indiana facility. We are requesting this information to determine whether you are complying with your CAA Minor Source Operating Permit (MSOP), the Indiana State Implementation Plan (SIP), and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR Part 63, Subpart JJJJJ].

At this time, EPA Region 5 is not accepting any hard-copy deliveries. If possible, we ask Thiesing to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Jacob Herbers at Herbers.Jacob@epa.gov to make arrangements to submit your response.

Thiesing must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject Thiesing to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Jacob Herbers at Herbers.Jacob@epa.gov.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to Paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 et seq., the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources [40 CFR Part 63, Subpart JJJJJ], or the Indiana State Implementation Plan (SIP).

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Thiesing must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a)) in accordance with the following schedule:

Part I: Within *21 calendar days* of the receipt of this request, Thiesing must respond to the questions in Part I.

Part II: Within *60 calendar days* of the receipt of this request, Thiesing must perform the stack testing specified in Part II. Within *30 calendar days* after completion of those tests, Thiesing must submit the complete results to EPA. Note that, as detailed in Paragraph 14 of Part II, Thiesing must submit a notification of the intent to test *30 calendar days* before testing is to occur.

Part I

1. Provide reports from all emissions tests performed at the facility in the past five years, or any other information that may be used to demonstrate compliance with the pounds per million British Thermal Units (lb/MMBtu) particulate matter (PM) emissions limits from the wood-fired boiler (D1), the wood-fired stoker stove (D2), and the gas-fired heater (D3); and with the pounds per hour (lb/hr) PM emissions limits from the chipper, the veneer clipping line, and the trim sawing operation (MSOP D.4.1). Emissions testing includes, but is not limited to compliance testing, engineering testing, and testing for general information. Also provide a copy of any report that resulted from the emission tests which meet the above criteria. Indicate whether such report was shared with the local and/or state permitting agency.
2. Provide the current preventive maintenance plans (PMPs) and maintenance logs for the wood-fired boiler, the wood-fired stoker stove, the gas-fired heater, woodworking operations, and all control devices for each of them (MSOP B.9).
3. Provide records of all opacity readings and continuous opacity monitoring system (COMS) data from the past five years (MSOP C.3), including all Relative Accuracy Test Audits (RATA).
4. Provide all malfunction reports from the past five years (MSOP C.14).
5. Provide records of the most recent biennial boiler tune-up (NESHAP JJJJJJ), including any parts that the contractor was unable to inspect in spring 2021, which Thiesing reportedly said they'd do during the next yearly shutdown.
6. Provide your three most recent annual compliance certifications, including deviations (NESHAP JJJJJJ).

7. Provide records of the dates of operation of the wood stove over the past five years (MSOP A.2.b).
8. Provide a diagram of each emissions unit and emissions control device at the facility (MSOP).
9. Provide the results of the energy assessment (NESHAP JJJJJ 40 CFR 63.11201(b) and Table 2).
10. Provide descriptions of all significant projects and reconstructions conducted on the boiler since June 4th, 2010 (NESHAP JJJJJ).

Part II

11. Conduct performance testing in accordance with EPA Reference Methods 1-4 (stack gas characteristics), Method 5 (filterable PM), and Method 202 (condensable PM) for three one-hour tests at the wood-fired boiler exhaust stack. During the testing, the boiler must be operated at the maximum hourly production rate under normal operating conditions, consistent with EPA Stack Testing Guidance¹.
12. Conduct performance testing in accordance with EPA Reference Methods 1-4 (stack gas characteristics), Method 5 (filterable PM), and Method 202 (condensable PM) for three one-hour tests, at the outlet of the wood-fired stoker fed stove. During the testing, the stove must be operated at the maximum hourly production rate under normal operating conditions, consistent with EPA Stack Testing Guidance¹.
13. Thiesing shall not conduct any irregular or unscheduled maintenance on the wood-fired boiler or the fly ash collector before conducting the above performance tests, unless such maintenance is necessary to address an imminent safety issue. If Thiesing identifies a safety issue prior to conducting the performance tests, which requires additional unplanned maintenance, it must immediately notify EPA of the safety issue and the maintenance activities which will occur to address the safety issue.
14. Notify EPA of the intent to test no later than **30 calendar days** prior to testing. Notification must include the scheduled testing date and a proposed testing protocol that fully describes the methods, planned operating parameters (*See* list in Paragraph 15, below), and procedures for testing. The protocol shall address the requirements of this information request. Thiesing must conduct the testing under a protocol approved in advance by EPA.

¹ Tests should be performed under conditions that represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and that are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. CAA National Stack Testing Guidance, § VII.5 (April 27, 2009), available at epa.gov/sites/default/files/2013-09/documents/stacktesting_1.pdf

15. As part of the performance testing, the following information should be recorded for each test and submitted to EPA in the test report outlined in Paragraph 16 below:
 - a. Visual emissions opacity (%);
 - b. COMS data for the boiler exhaust (%), including RATA;
 - c. Wood processing rate (tons/hour); and/or
 - d. Gas input rate (Btu/hour).
16. Submit a complete report of the emissions testing at the facility within **30 calendar days** of completion of the tests. The report shall include the following, at a minimum:
 - a. Summary of Results
 - i. Results of the emission tests in parts per million by volume, pounds per hour, and pounds per ton of wood processed or per Btu of gas used;
 - ii. Process data related to determination of compliance;
 - iii. Discussion of test errors;
 - iv. Discussion of any deviations from the reference test methods. Any planned deviations should be included in the protocol and approved prior to the testing; and
 - v. Production and fly ash collector operating data during the tests.
 - b. Facility Operations
 - i. Description of the process operation; and
 - ii. Hourly operating data for the day(s) of the tests.
 - c. Sampling and Analytical Procedures
 - i. Sampling port location(s) and dimensions of cross-section;
 - ii. Cyclonic flow results;
 - iii. Sampling point description, including labeling system;
 - iv. Brief description of sampling procedures, including equipment and diagram;
 - v. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 - vi. Brief description of analytical procedures, including calibration;
 - vii. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 - viii. Quality control/quality assurance procedures, tests, and results.
 - d. Appendix
 - i. Documentation of all calculations;
 - ii. Raw field data (original, not computer printouts);
 - iii. Laboratory report(s), with signed chain-of-custody forms;
 - iv. Calibration procedures and results;
 - v. Raw process and control equipment data, signed by plant representative;
 - vi. Test log;
 - vii. Project participants and titles; and
 - viii. Related correspondence.

Standard bcc's:

Official File Copy w/Attachment(s)

Originating Organization Reading File w/Attachment(s)

Other bcc's: